



**Guide
Dogs**
VICTORIA

13 February 2017

*Residential Tenancies Act Review:
Options Discussion Paper*

By email: yoursay@fairersaferhousing.vic.gov.au

Dear Sir / Madam,

Guide Dogs Victoria appreciates the opportunity to provide comment on the '*Heading for Home – Residential Tenancies Act Review: Options Discussion Paper*' [options paper] for consideration during the review of the Victorian Residential Tenancies Act 1997 (RTA).

Access to safe and secure housing is vital for all Australians, however there are often significant direct and indirect barriers which can constrain or prevent people who are blind or vision impaired successfully obtaining appropriate housing.

High levels of unemployment of people who are blind or vision impaired can often result in lower income, leading to a high degree of reliance on housing options regulated under the RTA.

As noted in previous consultations ongoing since 2015 and within the *options paper* there are a numerous factors which create barriers to achieving successful occupancy in appropriate accommodation.

As articulated in the *options paper*, these barriers to tenancy often include such elements as accessible design, cost of housing, location near a good public transport infrastructure and other essential community facilities, accessible information and accessible formats for application and potential dispute processes.

As the *options paper* states '*the Victorian Equal Opportunities Act [EOA] prohibits landlords from refusing to provide accommodation to a person with a disability because that person has an assistance dog*'.

Despite the recognition of the relevant state and legislative enforcement of access rights for Guide Dogs, there remain many avenues for landlords to exercise direct and indirect discrimination towards Guide Dog Handlers and their Guide Dogs which occurs most often at the application process.

Guide Dogs Victoria provides ongoing community education in an effort to ensure a greater level of understanding as to the high level training and behavioural standards of Guide Dogs and the obligations on handlers to maintain these, including exceptional hygiene habits given the public reams guide dogs visit on a daily basis.



**Guide
Dogs**
VICTORIA

Despite this, it remains apparent that a proportion of prospective landlords will refuse an application from a prospective tenant and their guide dog. In understanding that refusal on such a basis is illegal, most will find an alternative reasons for the denial of the application to obfuscate the true reason behind an unsuccessful application by a Guide Dog Handler.

We recommend that consideration be given to not requiring disclosure of an assistance animal trained and endorsed by assistance animal providers who are accredited under the International Guide Dog Federation or Assistance Dogs International Standards during the initial application processes as this will allow fairer, non-discriminatory consideration of an application.

Guide Dogs Victoria is pleased to note a commitment in the *options paper* to ongoing education of legal obligations to act in a non-discriminatory manner. Our organisation would welcome the opportunity to assist with this education process as appropriate.

Should further detail on any aspect of our submission be of assistance, please do not hesitate to contact us.

Yours Sincerely,

Karen Hayes
Chief Executive Officer
Guide Dogs Victoria

ⁱ 'Heading for Home – Residential Tenancies Act Review: Options Discussion Paper, pg 52